

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

RHONDA BURNETT, JEROD BREIT, HOLLEE ELLIS,
FRANCES HARVEY, and JEREMY KEEL, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF REALTORS,
REALOGY HOLDINGS CORP., HOMESERVICES OF
AMERICA, INC., BHH AFFILIATES, LLC, HSF
AFFILIATES, LLC, RE/MAX LLC, and KELLER
WILLIAMS REALTY, INC.,

Defendants.

Case No. 19-CV-00332-SRB

DON GIBSON, LAUREN CRISS,
JOHN MEINERS, AND DANIEL UMPA,
Individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

NATIONAL ASSOCIATION OF
REALTORS, et al.,

Defendants.

Case No. 4:23-cv-00788-SRB
[Consolidated with
4:23-cv-00945-SRB]

DECLARATION OF JENNIFER M. KEOUGH

I, Jennifer M. Keough, declare as follows:

1. I am Chief Executive Officer, President, and Co-Founder of JND Legal Administration LLC (“JND”). I have more than 20 years of experience creating and supervising

legal notice and claims administration programs and have personally overseen well over 1,000 matters. A comprehensive description of my experience is attached as **Exhibit A**.

2. This Declaration is submitted to provide a quarterly accounting of all fees and charges requested from the Settlement Fund by JND pursuant to the Court's Order, dated May 7, 2025.

3. JND served as the Notice Administrator for the Notice of Pendency ("NOP") in *Moehrl et al., v. National Ass'n of Realtors et al.*, Case No. 1:19-cv-01610 (N.D. Illinois). The NOP was sent in February 2024.

4. In connection with the NOP, JND sent over 5 million postcards, 13.5 million emails, and completed a media publication campaign. JND agreed to defer payment of our invoices until after any Settlements were entered into and approved, or until after any payments were received as a result of a final judgment. While Settlements have since been entered into and approved by this Court with the Defendants identified in the NOP, certain objectors have appealed approval of the Settlements. As those appeals remain pending, Settlement funds have not been distributed to Class Counsel for their attorneys' fees and costs, and JND has not received any payment for the work performed for the NOP, which totals \$2,996,807.75.

5. JND is serving as the Settlement Administrator for the 29 separate Settlements reached in the following actions (hereinafter the "Realtors Settlements"): *Burnett et al., v. National Ass'n of Realtors et al.*, Case No. 19-CV-00332-SRB (W.D. Missouri), *Gibson et al. v. National Association of Realtors et al.*, (W.D. Mo. Case No. 23-CV-788-SRB); and *Keel, et al. v. Washington Fine Properties, et al.*, (W.D. Mo. Case No. 4:25-CV-00055-SRB).

6. In administrating the Realtors Settlements, over the past 18 months, JND has sent four (4) rounds of Initial Notice and two (2) rounds of reminder notice, and has undertaken four (4) media publication campaigns.

7. As of June 2025, JND has sent over 100 million emails and 38 million postcards as a part of the Realtors Settlements noticing campaigns.

8. In July 2024, at the request of Counsel, JND began staffing contact center representatives to handle class member questions via telephone and email. To date, JND has handled over 25,000 calls and 30,000 emails.

9. JND received over 2.5 million claim submissions. JND accepted claim submissions via paper or through the online claim form, which we designed and built for the particular parameters of these Settlements. JND also established a process for large filers to submit their claims in bulk.

10. Between January 2024 and May 2025, JND sent 47 invoices totaling \$32,777,091.15 to Class Counsel in connection with the NOP and Realtors Settlements. As represented in the table below, JND has been paid on many of its invoices, and several other invoices, totaling \$5,919,220.72, remain outstanding (including the \$2,996,807.75 for work performed for the NOP). Nevertheless, JND has not charged any interest on the outstanding balance, although our terms and conditions allow us to add a 1.5% monthly finance charge after 30 days of non-payment.

Matter	Invoice Date	Amount	Paid
Moehrl Notice of Pendency	2/21/2024	\$2,294,947.48	No
	4/15/2024	\$631,737.50	No
	4/29/2024	\$51,080.53	No
	5/30/2024	\$19,042.24	No
Burnett February 2024 Mailing	1/24/2024	\$4,355,400.00	Yes
	2/21/2024	\$2,391,352.48	Yes
	4/15/2024	\$1,747,780.57	Yes
	4/29/2024	\$296,925.35	Yes
	5/30/2024	\$225,319.80	Yes
	6/21/2024	\$457,662.87	Yes
Gibson July 2024 Mailing	7/11/2024	\$6,265,200.00	Yes
	7/29/2024	\$38,105.25	Yes
	8/28/2024	\$372,639.94	Yes
	9/23/2024	\$625,361.01	Yes
	10/30/2024	\$310,295.83	Yes
	11/26/2024	\$76,618.33	Yes
	12/26/2024	\$2,392.30	No
	1/24/2025	\$3,480.63	No
	2/20/2025	\$1,361.39	No

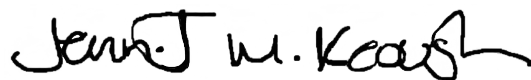
Matter	Invoice Date	Amount	Paid
Burnett August 2024 Mailing	7/11/2024	\$6,265,200.00	Yes
	8/28/2024	\$11,709.25	Yes
	9/23/2024	\$322,110.43	Yes
	10/30/2024	\$529,655.82	Yes
	12/4/2024	\$283,311.48	Yes
	12/4/2024	\$14,605.43	Yes
	12/26/2024	\$26,275.26	Yes
	12/26/2024	\$143,299.45	Yes
	1/24/2025	\$16,132.32	Yes
	2/20/2025	\$2,073.84	Yes
Gibson/Keel February 2025 Mailing	12/26/2024	\$4,857.13	No
	1/24/2025	\$292.00	No
	2/20/2025	\$9,867.50	No
	2/20/2025	\$8,842.75	No
	3/20/2025	\$108,017.99	No
	4/30/2025	\$485,505.62	No
	5/15/2025	\$124,997.88	No
Shared Administration Costs	7/29/2024	\$165,163.50	Yes
	8/28/2024	\$200,124.98	Yes
	9/23/2024	\$633,955.00	Yes
	10/30/2024	\$496,594.85	Yes
	11/26/2024	\$368,683.60	Yes
	12/26/2024	\$216,313.79	Yes
	1/24/2025	\$192,346.56	No
	2/20/2025	\$225,543.91	No
	3/20/2025	\$381,737.46	No
	4/30/2025	\$553,289.81	No
	5/15/2025	\$819,880.04	No

11. The chart above represents the total amounts JND has charged to date in this matter. JND's confidential invoices are attached as Exhibit B. None of JND, its employees and officers, or any entity affiliated with JND has received any compensation (including but not limited to rebates, awards, and/or credits) from any bank, vendor, or other third party in connection with any of our work on the NOP or Realtors Settlements. The attached invoices represent all fees and charges incurred by JND for its services in this litigation to date. JND will transparently report any payments received in connection with this matter on future invoices. JND has not received any additional fees, charges, rebates, awards, credits from vendors, or financial benefits from banks or other institutions.

12. None of the individual attorneys or firms representing Plaintiffs in this action have any ownership or other financial interest in JND. Furthermore, JND has not offered or provided any compensation of any kind (including but not limited to rebates, kickbacks, or financial payments) to any of the attorneys or law firms representing Plaintiffs in this action in connection with JND's work on the NOP or Realtors Settlements.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 6, 2025, in Seattle, Washington.



JENNIFER M. KEOUGH